

## STATEMENT OF LEGAL AND FACTUAL BASIS

Stanley Furniture Company, Inc.  
Martinsville, Virginia

Permit No. VA-31027  
Permit Date: **November 18, 2002**  
Registration No. 31027  
AIRS ID No. 51-089-0122

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Stanley Furniture Company, Inc. has applied for a Title V Operating Permit for its wood furniture manufacturing plant located at 140 Hollie Drive in the town of Martinsville, VA. The Department has reviewed the application and has prepared a Title V Operating Permit.

## FACILITY INFORMATION

### Permittee

Stanley Furniture Company  
P.O. Box 30  
Martinsville, VA. 24168

### Facility

Stanley Furniture Company  
140 Hollie Drive  
Martinsville, VA. 24112

## **SOURCE DESCRIPTION**

SIC Code: 2511 - wood household furniture manufacturing.

This is a conventional household wood furniture manufacturing plant. The facility is located in the town of Martinsville in Henry County. It is covered by the 11-17-99 Prevention of Significant Deterioration (PSD) permit, to construct and operate a new wood furniture manufacturing facility.

Overall, the plant receives dried rough sawn lumber, performs various woodworking processes, and finishes the wood (primarily spray stains, spray sealers, and spray lacquers). Finishes are spray booth applied VHAP compliant VOC based wood furniture coatings.

The facility consists of a case goods finishing room equipped with 11 spray booths and a community drying oven. Other emission sources are a number of smaller booths and dip tanks located in the assembly and rub/pack areas. Emissions will consist primarily of VOCs from finishes applied in the case goods finishing line. Particulate emissions will be generated by overspray of solids applied in the finishing line and by woodworking equipment at the facility. Emissions from finishing include 338 tons per year of volatile organic compounds (VOC), which triggered PSD review for VOC emissions. Emissions of other pollutants are below PSD significance levels.

The other significant emission source is a 26.5 MMBTU/hr natural gas and distillate oil fired boiler which is subject to New Source Performance Standards (NSPS), 40 CFR 60, Subpart Dc.

The facility is a Title V major source due to emissions of VOC exceeding 100 tons/yr, potential to emit (PTE) emissions exceeding 100 tons/yr for SO<sub>2</sub> for No. 2 fuel oil auxiliary fuel, combined HAPS exceeding 25 tons/yr, and PTE exceeding 10 tons/yr for each of the following individual HAPS: cumene, methyl chloroform, butanone, hexanone, xylene, ethyl benzene, toluene, methanol, and glycol ethers. All these HAPS are VOCs and VHAPS from finishing operations.

This facility is subject to the new source provisions of the MACT standard for wood furniture manufacturers (40 CFR 63, Subpart JJ). Stanley is implementing new source MACT requirements by utilizing high volume, low pressure (HVLP) applicators and other pollution prevention techniques to minimize VOC emissions. No add-on VOC controls exist.

## **COMPLIANCE STATUS**

The facility is inspected at least once per year. The facility was in compliance with the State Air Pollution Control Board Regulations during the last inspection, which was conducted on April 16, 2002.

## **EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION**

The emissions units are grouped as follows:

**EU-FB Fuel Burning Equipment Emission Source-Boiler.** One Kewanee 26.5 million Btu/hr Kewanee boiler firing natural gas and distillate oil. Constructed after 1972 and subject to NSPS Dc.

**EU-WW Emission Source-Woodworking.** Includes all woodworking equipment with dust emissions, including wood hogging and wood fuel material transfers. All wood dust emissions are controlled by 4 baghouses exhausting to atmosphere, plus a closed loop cyclone.

**EU-FO Emission Source-Finishing.** All finishing and related VOC emissions, primarily 17 spray booths. The wood furniture MACT, 40 CFR 63 JJ, does apply to this facility. Overspray particulates from all spray booths are controlled by spray booth dry filters or water curtains.

## **EMISSIONS INVENTORY**

Because Stanley Beaver Creek is a new facility, emissions were 0 at the time of Title V application.

## **EMISSION UNIT APPLICABLE REQUIREMENTS – EU-FB.**

The plant has one boiler. The boiler is a 26.5 MMBTU/hr Kewanee boiler burning natural gas as the primary fuel and distillate oil as a back-up fuel. Emission limits were calculated for two scenarios: natural gas usage at 8760 hours per year and 450,000 gallons of distillate oil usage, with natural gas burned for the remaining hours of the year. The annual emission limit for each pollutant is based on the worst case emissions calculated for either scenario. The boiler was permitted by an 11/17/99 NSR permit and is subject to NSPS Dc.

### **A. Limitations:**

1. *Fuel-* The approved fuels for boiler (EU-FB) are distillate oil and natural gas. A change in the fuels may require a permit to modify and operate.  
(9 VAC 5-80-110, 9 VAC 5-80-10, 11-17-99 **NSRPC**\* 25\*)  
**NSRPC** = New Source Review Permit Condition
2. *Fuel Consumption-* The Kewanee boiler (EU-FB) shall consume no more than 450,000 gallons of distillate oil per year, calculated monthly as the sum of each consecutive 12 month period.  
(9 VAC 5-80-10, 9 VAC 5-50-260, 11-17-99 NSRPC 26)
3. Emissions from the operation of the Kewanee boiler (EU-FB) shall not exceed the limits specified below:

Particulate Matter	0.4 lbs/hr	1.1 tons/yr
PM-10	0.2 lbs/hr	0.9 tons/yr
Sulfur Dioxide	13.6 lbs/hr	16.0 tons/yr
Nitrogen Oxides (as NO <sub>2</sub> )	3.8 lbs/hr	12.8 tons/yr
Carbon Monoxide	2.2 lbs/hr	9.4 tons/yr
Volatile Organic Compounds	0.1 lbs/hr	0.6 tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 29)

4. *Visible Emissions Limit*- Visible emissions from the Kewanee boiler (EU-FB) shall not exceed 10 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.  
(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 30)
5. *Requirements by Reference*- Except where this permit is more restrictive than the applicable requirement, the Kewanee boiler (EU-FB) shall be operated in compliance with 40 CFR 60, Subpart Dc.  
(9 VAC 5-80-110, 9 VAC 5-40-940)

### **Monitoring/O & M/Recordkeeping:**

The permit includes requirements for monitoring and maintaining records of all monitoring and testing required by the permit. The inspections, maintenance, monitoring and recordkeeping requirements in this section, plus monitoring and recordkeeping under the Facility Wide and General Conditions Sections below, constitute the periodic monitoring requirements for this equipment group. The monitoring and records include:

1. Visible emissions periodic monitoring is required to assure control equipment maintenance and compliance with permit visible emission limits. This requires a weekly observation, and its recording, to check for any visible emissions. If any visible emission is observed, the condition shall be corrected and recorded, or a 40 CFR 60 Appendix A Method 9 visible emission evaluation performed and recorded to check opacity compliance. Refr. 9 VAC 5-80-110 E.

2. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the boiler, and maintain records of inspection results.
3. Develop a maintenance schedule and maintain records of maintenance, have written operating procedures available, and train operators in the proper operation of the equipment and emission controls.
4. Distillate oil: The permittee shall obtain a certification from the fuel supplier covering each shipment of distillate oil. Each fuel supplier certification or alternative statement shall include the following:
  - a. The name of the fuel supplier,
  - b. The date on which the oil was received,
  - c. The amount of distillate oil delivered in the shipment,
  - d. A statement that the oil complies with the American Society for Testing and Materials (ASTM) specifications for fuel oil numbers 1 and 2, and
  - e. The sulfur content of the oil.

(9 VAC 5-80-110, 9 VAC 5-170-160, and 9 VAC 5-50-410)

5. Boiler EU-FB: The permittee shall maintain records of all emission data and operating parameters necessary to demonstrated compliance with this permit. The content of and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:
  - a. Daily, monthly, and annual consumption of natural gas and/or distillate oil, or alternate records as approved in writing by EPA, Region III. Annual fuel consumption shall be calculated monthly as the sum of each consecutive 12 month period.
  - b. All fuel supplier certifications
  - c. Records of scheduled and unscheduled maintenance, and operator training.
  - d. Results of all stack tests, visible emission evaluations and performance evaluations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.  
(9 VAC 5-80-110, 9 VAC 5-50-50, and 11-17-99 NSRPC 32)

**Testing:** The permit does not require source tests for this process. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method - Subject to DEQ approval at the time of the test (except for Method 9). (40 CFR Part 60, Appendix A)
PM/PM-10	EPA Method 5, or DEQ approved method
SO <sub>2</sub>	Fuel analysis, EPA Method 6, or DEQ approved method
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

**Reporting:** Title V semi-annual reports of the results of monitoring and recordkeeping for each first and second half calendar year are required to be submitted to DEQ by each March 1 and September 1 respectively. In addition, as the Kewanee boiler is subject to NSPS Dc fuel quality reports must be submitted on a semi-annual basis.

1. *Semi-Annual Reports*- The permittee shall submit fuel quality reports to the West Central Regional Office within 30 days after the end of each semi-annual period. If no shipments of distillate oil were received during the semi-annual period, the semi-annual report shall consist of the dates included in the semi-annual period and a statement that no oil was received during the semi-annual period, the reports shall include:
  - a. Dates included in the semi-annual period,
  - b. A copy of all fuel supplier certifications for all shipments of distillate oil received during the semi-annual period or a semi-annual summary from each fuel supplier,
  - c. A signed statement from the owner or operator of the facility that the fuel supplier certifications or summaries of fuel supplier certifications represent all of the distillate oil burned or received at the facility.

One copy of the semi-annual report shall be submitted to the U.S. Environmental Protection Agency.  
(9 VAC 5-170-160, 9 VAC 5-50-50, 9 VAC 5-80-110, and 11-17-99 NSRPC 33)

**EMISSION UNIT APPLICABLE REQUIREMENTS- Wood Working - Refr. EU-WW.**

This equipment group includes all of this wood furniture plant's wood working processes and equipment, including wood hogging and wood fuel material transfers. All wood dust emission sources are controlled by 4 baghouses (fabric filters) exhausting to atmosphere, plus a closed loop cyclone.

There is no applicable NSPS (40 CFR 60) at this time for this process. The wood furniture plant MACT (40 CFR 63 Subpart JJ) does not apply to the woodworking materials and processes that are currently used at this plant.

**A. Limitations:**

1. *Woodworking Emission Controls:* Particulate emissions from all wood dust emission points to atmosphere (ES-WW), including all wood working equipment, wood hogging, and wood fuel material transfers, shall be controlled by baghouses (fabric filters), unless controlled by closed loop cyclones, enclosed direct boiler feeds, or internal fabric filters without exhausts to atmosphere, or DEQ approved equivalent. The fabric filters shall be provided with adequate access for inspection and maintained by the permittee such that they are in proper working order.  
(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 15)
2. *Woodworking Emission Controls:* Fugitive particulate emissions from the collection, transfer and handling of wood waste from each dust collection system shall be controlled by a fabric filter, a completely closed transfer system, and/or by rotary air lock from the collector to an enclosed bin .  
(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 16)
3. *Woodworking Operational Limits:* The four fabric filters shall not operate for a combined total of more than 16,000 hours per year, calculated monthly as the sum of each consecutive twelve (12) month period.  
(9 VAC 5-80-110, 9 VAC 5-80-10H, 9 VAC 5-170-160, 11-17-99 NSRPC 18)
4. *Woodworking emissions:* Emissions from the operation of each fabric filter shall not exceed the limits specified below:  
Particulate Matter                      0.004 gr/dscf

PM-10

0.002 gr/dscf

(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 19)

5. *Woodworking visible emissions:* Visible emissions from each baghouse (fabric filter) exhausting to atmosphere for all wood dust emission points (ES-WW), shall not exceed five (5) percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, or malfunction.  
(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 20)
6. *Woodworking visible fugitive emissions:* Visible emissions resulting from the collection, transfer, or handling of wood waste, shall not exceed ten (10) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.  
(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 21)

#### **Monitoring/O & M/Recordkeeping:**

The permit includes requirements for monitoring and maintaining records of all monitoring and testing required by the permit. The inspections, maintenance, monitoring and recordkeeping requirements in this section, plus monitoring and recordkeeping under the Facility Wide and General Conditions Sections below, constitute the periodic monitoring requirements for this equipment group. The monitoring and records include:

1. Visible emissions periodic monitoring is required to assure control equipment maintenance and compliance with permit visible emission limits. This requires a weekly observation, and its recording, of each emission point in this emissions group to check for any visible emission. If any visible emission is observed, the condition shall be corrected and recorded, or a 40 CFR 60 Appendix A Method 9 visible emission evaluation performed and recorded to check opacity compliance. This requirement is to assure good control of particulate emissions. Refr. 9 VAC 5-80-110 E.
2. The pressure drop across each baghouse shall be continuously measured and recorded weekly. This requirement is to help assure good control of particulate emissions.
3. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of the fabric filters, and maintain records of inspection results.
4. Develop a maintenance schedule and maintain records of maintenance, have written operating procedures available, train operators in the proper operation of the equipment and controls affecting emissions, and maintain an inventory of spare parts needed to maintain the

fabric filters in proper working order to minimize emissions.

5. The annual hours of operation of each fabric filter and of the four fabric filters combined shall be calculated monthly as the sum of each consecutive twelve (12) month period.
6. Title V periodic monitoring to assure meeting the particulate emission limit of 0.004 grains/scf of exhaust gas for PM and 0.002 grains/scf for PM-10 is satisfied by the periodic monitoring that assures good baghouse operation and maintenance, periodic inspections and recordkeeping, and periodic visible emission observations to assure that the 5% opacity requirements are met (normally zero opacity). The particulate lb/hr limits are met as long as the grains/scf limits are met and the air handling system capacity (number of baghouses) is not increased. The particulate tons/yr limits are met as long as the lbs/hr limits are met and the plant wood throughput limits are met.

**Testing:** The permit does not require source tests for this process. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method - Subject to DEQ approval at the time of the test (except for Method 9). (40 CFR Part 60, Appendix A)
PM/PM-10	EPA Method 5, or DEQ approved method.
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

**Reporting:** Title V semi-annual reports of the results of monitoring and recordkeeping for each first and second half calendar year are required to be submitted to DEQ by each March 1 and September 1 respectively.

## **EMISSION UNIT APPLICABLE REQUIREMENTS 2 - Finishing - Refr. EU-FF.**

This group includes all finishing for this plant and all finishing related VOC emissions. 40 CFR 63 Subpart JJ, the wood furniture MACT, does apply, as a new source. The plant's primary method for meeting the MACT is to normally use only compliant coatings, where required. There is no applicable NSPS (40 CFR 60) for this process at this time. There are no add-on VOC controls for this portion of the plant, which includes 17 spray booths. Stanley uses high-volume, low pressure (HVLV) applicators and other pollution prevention techniques to minimize VOC emissions.

**Limitations:**

1. *Finishing controls:* Particulate emissions from each finishing spray booth shall be controlled by water curtains, or by an alternative control device with equivalent efficiency. The water curtains shall be provided with adequate access for inspection and maintained by the permittee such that they are in proper working order.  
(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 3)
2. *Finishing controls:* Volatile Organic Compound emissions from the finishing process shall be minimized by proper spraying technique, the use of HVLP and air assisted airless spray equipment, and by complying with the Work Practice standards of 40 CFR 63, Subpart JJ.  
(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 4)
3. *Fugitive Emission finishing controls:* Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.  
(9 VAC 5-80-110, 9 VAC 5-50-260, 11-17-99 NSRPC 5)
4. *Finishing throughput:* The throughput of VOC in finishing and related materials shall not exceed 338 tons per year, with the annual amount calculated monthly as the sum of each consecutive twelve (12) month period.  
(9 VAC 5-80-110, 9 VAC 5-170-160)
5. *Plantwide finishing emissions:* Total emissions from the finishing operation (including gluing, finishing, assembly, and rub/pack areas) shall not exceed the limits specified below:

PM-10	4.8 tons/yr
Volatile Organic Compounds	338 tons/yr
VOC/VHAP	New Source Emission Limits of 40 CFR 63, Subpart JJ

(summarized in Attachment B to this permit)

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-80-1700, 11-17-99 NSRPC 7)

**Monitoring/O & M/Recordkeeping:**

The permit includes requirements for monitoring and maintaining records of all monitoring and testing required by the permit. The inspections, maintenance, monitoring and recordkeeping requirements in this section, plus monitoring and recordkeeping under the Facility Wide and General Conditions Sections below, constitute the periodic monitoring requirements for this equipment group. The monitoring and records include:

1. Visible emissions periodic monitoring is required to assure control equipment maintenance and compliance with permit visible emission limits. This requires a weekly observation, and its recording, of each operating emission point in this emissions group to check for any visible emission. If any visible emission is observed, the condition shall be corrected and recorded, or a 40 CFR 60 Appendix A Method 9 visible emission evaluation performed and recorded to check opacity compliance. This requirement is to assure good control of overspray particulates. Refr. 9 VAC 5-80-110 E.
2. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of the water curtains and fabric filters, and maintain records of inspection results.
3. Develop a maintenance schedule and maintain records of maintenance, have written operating procedures available, train operators in the proper operation of the equipment, and maintain an inventory of spare parts needed to maintain the water curtains and fabric filters in proper working order to minimize emissions.
4. The permittee shall maintain records of all *finishing* emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:
  - a. VOC consumption: The consumption of VOC (in tons), including all adhesives, coatings, thinners, and solvents. The VOC content shall be based on Certified Product Data Sheets, 40 CFR 60 Appendix A Method 24, or DEQ approved equivalent. The annual quantities shall be calculated monthly as the sum of each consecutive twelve (12) month period.
  - b. Records necessary to show compliance with the new source provisions of 40 CFR 63, Subpart JJ, including all future revisions.
  - c. Calculated air pollutant emissions of PM-10 from the spray booths, using a calculation method approved by the West Central Regional Office to verify compliance with emission limits
  - d. Records of scheduled and unscheduled maintenance, and operator training

(9 VAC 5-80-110, 9 VAC 5-50-50, 11-17-99 NSRPC 12)

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

**Testing:** The permit does not require source tests for this process. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method - Subject to DEQ approval at the time of the test (except for Method 9). (40 CFR Part 60, Appendix A)
Visible Emissions	EPA Method 9
VOC	40 CFR 63 Subpart JJ Wood Furniture MACT Certified Product Data Sheets, 40 CFR 60 Appendix A method 24, or DEQ approved equivalent.

**Reporting:** Title V semi-annual reports of the results of monitoring and recordkeeping for each first and second half calendar year are required to be submitted to DEQ by each September 1 and March 1 respectively.

**EMISSION UNIT APPLICABLE REQUIREMENTS - Facility Wide Conditions.  
40 CFR 63 Subpart JJ (Wood Furniture MACT).**

This MACT is applicable to this plant. The mandatory compliance date has past. The plant is in compliance with the MACT. The facility is required to be operated in compliance with the MACT. Much of this MACT (several pages) is repeated in this Title V permit for informational purposes under the section on facility wide conditions. For the materials and processes currently used at this plant, the principal portion of the MACT that is applicable to this facility concerns the VHAPS in much of finishing. The plant's principal way of meeting the MACT is to normally use only MACT compliant coatings.

**Streamlined Requirements**

Streamlining 1: Obsolete conditions: The conditions in the NSR permit are streamlined out which deal with new equipment installation time frames and startup initial notifications, initial visible emissions evaluations, and initial stack tests because these conditions are obsolete due to having been completed for all permitted equipment.

## **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or excess emissions, including those caused by upsets, within four daytime business hours.

## **STATE ONLY APPLICABLE REQUIREMENTS**

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

NA.

## **FUTURE APPLICABLE REQUIREMENTS**

NA.

## **INAPPLICABLE REQUIREMENTS**

NA.

## **COMPLIANCE PLAN**

NA because this facility is considered to be in compliance.

## **INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (5-80-720 C)
N/A	Five bulk storage tanks for finishing	9 VAC 5-	VOC (less than 5	Each tank has

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (5-80-720 C)
	material	80-720 B	tpy)	a capacity of 3,000 gallons
N/A	One petroleum liquid storage vessel subject to NSPS Kb.	9 VAC 5-80-720 B	VOC (less than 5 tpy)	12,000 gallons

N/A	23 natural gas fired space heaters	9 VAC 5-80-720 C		Each heater has a capacity less than or equal to 0.2 MMBtu/hr
N/A	Maintenance Parts Washer and dip tank, utilizing non-halogenated solvents only	9 VAC 5-80-720 A		

### CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

### PUBLIC PARTICIPATION

A public notice regarding the draft permit was published in the *Martinsville Bulletin* on August 18, 2002 . The public comment period ended September 18, 2002. EPA was also given a chance to comment. No comments were received from EPA or the public. EPA also made no comment in the 45 day comment period.